40-8914



May 16, 1991

Mr. Ramon E. Hall United States Nuclear Regulatory Commission - Region IV Uranium Recovery Field Office P.O. Box 25325 Denver, CO 80225

SURIECT: License SUA-1482, Johnny M

Dear Mr. Hall:

As I have discussed with Ms. Jacoby, Hecla has initiated reclamation at the Johnny M site. Reclamation will be conducted in accordance with the plan approved by the NRC. One of the license conditions is that we give the NRC notice of the reclamation activity to allow the NRC to conduct radiological surveys at the site. It is our present understanding that, barring weather delays, the soils contaminated with byproduct material will be removed from the site during the period May 13-22; we will complete our radiological surveys and soil sampling (in accordance with the reclamation plan) immediately thereafter. If the NRC elects to be on site to conduct radiological surveys or inspect the reclamation activities after May 22, we will need prior notification since we will have to make arrangements for our representative to open locked gates to the property. We will not be on site during the period between material removal and recontouring except for a limited time for our own survey work. We intend to recontour the site during June, so your prompt attention to your survey requirements will be appreciated. If you elect to not come to the site, we would appreciate notification in that regard so that we do not unnecessarily delay the contractor's work. (Such a notification can be given after our removal activities are complete if you so desire.) We will notify your office again when the contaminated soil materials have been removed from the site.

If your staff elects to visit the site to conduct radiological surveys, we would appreciate their prior review of materials which have been submitted to the NRC. Our previous surveys have identified the background levels of radiation due to the nature of the host rock and uranium ore in the area. I believe that refamiliarization with the data and characteristics of the Johnny M site before the site visit will expedite your work and allow us to continue with our recontouring work in a timely way.

We previously requested that following reclamation our license be released. The NRC has requested a number of documents related to the land transfer requirements of Criterion 11; it is our understanding that these documents are now in your hands. We further understand that

OFFICIAL DOCKET CUPY 91-0488

completion of reclamation and verification surveys and soil sampling which show byproduct materials have been removed to meet the specified levels of radiation emission (from byproduct materials) will allow our Johnny M license to be released.

A review of your letter of October 10, 1990, in which you amended our license, we again identify the statement that "At this time we are not able to specifically identify the conditions that you must satisfy before remediation is sufficient and the license could be terminated. When the conditions have been defined for termination of your license, we will communicate them to you." Since that letter we have had discussions with the NRC about the release of the license, and have presumed that the surface and mineral ownership issues and the questions about backfilling have been resolved. However, the NRC has not addressed any issues regarding remediation to us in the past six months; we therefore conclude that the approved reclamation plan is sufficient for site remediation and have proceeded to implement the plan.

We appreciate your assistance in the reclamation of Johnny M. If you have any questions, please do not hesitate to call. Again, we will notify your office as soon as we have completed removal of the byproduct contaminated soils.

Very truly yours,

Larry A. Drew

Manager - Environmental Affairs

ry de Chin

LAD:csm

ce: Dawn Jacoby